

1 ADAM R. FULTON, ESQ.
2 Nevada Bar No. 11572
3 afulton@jfnvlaw.com
4 LOGAN G. WILLSON, ESQ.
5 Nevada Bar No. 14967
6 logan@jfnvlaw.com
7 **JENNINGS & FULTON, LTD.**
8 2580 Sorrel Street
9 Las Vegas, NV 89146
10 Telephone: (702) 979-3565
11 Facsimile: (702) 362-2060
12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 KATHERINE AMES, an individual,
16 Plaintiff,

17 vs.

18 UNIVERSITY MEDICAL CENTER OF
19 SOUTHERN NEVADA, a non-profit
20 organization; DOES I-X, inclusive; and
21 ROE CORPORATIONS I-X, inclusive,
22 Defendants.

Case No.: 2:24-cv-02369-CDS-DJA

RENEWED JOINT DISCOVERY PLAN AND
SCHEDULING ORDER SUBMITTED IN
COMPLIANCE WITH LR 26-1(b)

23 Pursuant to Fed. R. Civ. P. 26 and 26-1, Plaintiff KATHERINE AMES, by and through her
24 attorneys of record, ADAM R. FULTON, ESQ. and LOGAN G. WILLSON, ESQ. of the law firm of
25 JENNINGS & FULTON, LTD., and Defendant UNIVERSITY MEDICAL CENTER OF
26 SOUTHERN NEVADA, by and through its attorneys of record, MATTHEW T. DUSHOFF, ESQ.,
27 JOEL Z. SCHWARZ, ESQ., and ELIZABETH FRIEDMAN, ESQ., of the law firm of SALTZMAN
28 MUGAN DUSHOFF, hereby submit this proposed Renewed Joint Discovery Plan and Scheduling
Order.

First Appearance. Plaintiff filed the Complaint and Demand for Jury Trial on December
18, 2024. On January 15, 2025, Defendant appeared and filed its Motion to Dismiss. After filing the
January 17, 2025 Notice of Withdrawal, Defendant filed its Answer on February 6, 2025.

1 **FRCP 26(f) Conference.** On February 28, 2025, counsel for Plaintiff, Logan G. Willson,
2 Esq., and counsel for Defendant, Matthew T. Dushoff, Esq., participated in a discovery and
3 scheduling conference to discuss all issues required by Fed. R. Civ. P. 26(f) and LR 26-1. After
4 receipt of the March 7, 2025 Minute Order (ECF No. 18), the parties (“Parties”) met and conferred
5 and agreed to the revised proposed revised discovery deadlines.

6
7 1. **Discovery Cut-Off Date.** The proposed cut-off date for discovery shall be July 15,
8 2025, six (6) months from Defendant’s January 15, 2025 appearance.

9 2. **Amending Pleadings and Adding Parties.** All motions to amend the pleadings or
10 add parties shall be filed no later than April 16, 2025, not more than 90 days prior to the close of
11 discovery.

12 3. **Fed. R. Civ. P. 26(a)(2) (Experts).** Disclosures concerning experts shall be made
13 by May 16, 2025, not more than 60 days prior to the close of discovery. Disclosures concerning
14 rebuttal experts shall be made by June 13, 2025, not more than 30 days prior to the close of
15 discovery.

16
17 4. **Dispositive Motions.** The date for filing dispositive motions shall be not later than
18 August 14, 2025, not more than 30 days after the close of discovery. In the event that the discovery
19 period is extended from the discovery cut-off date set forth in this proposed discovery plan and
20 scheduling order, the date for filing dispositive motions shall be extended to not later than thirty (30)
21 days from the subsequent discovery cut-off date.

22
23 5. **Pretrial Order.** The date for filing the joint pretrial order shall be not later than
24 September 15, 2025, 30 days after the dispositive motions deadline.
25 ~~August 14, 2025, 30 days after the close of discovery.~~ In the event that dispositive motions are filed,
26 the date for filing the joint pretrial order shall be suspended until thirty (30) days after the decision
27 on the dispositive motions or until further order of the Court. In the further event that the discovery
28 period is extended from the discovery cut-off date set forth in this renewed proposed discovery plan

1 and scheduling order, the date for filing dispositive motions shall be extended to not later than thirty
2 (30) days from the subsequent discovery cut-off date.

3 6. **Fed. R. Civ. P.26(a)(3) Disclosures.** The disclosures required by Fed. R. Civ. P.
4 26(a)(3), and any objections thereto, shall be included in the renewed joint pretrial order.

5 7. **Alternative Dispute Resolution.** The Parties have discussed all alternative forms of
6 dispute resolution and will continue to explore the possibility as this case proceeds.

7 8. **Alternative Form of Case Disposition.** The Parties have discussed this option and
8 agree that this case is properly set before the District Court.

9 9. **Electronic Evidence.** The Parties have discussed the use of electronic evidence at
10 trial and plan on presenting electronic evidence pursuant to this rule at trial.

11 10. **Extensions or Modification of The Discovery Plan and Scheduling Order.** Any
12 stipulation or motion must be made pursuant to LR ²⁶⁻³~~26-4~~ and be supported by a showing of good
13 cause, no later than twenty-one (21) days prior to the discovery cut-off date.

14 11. **Subjects of Discovery.** The Parties agree that discovery may be taken on any
15 subjects permitted by the Federal Rules of Civil Procedure.

16 12. **Discovery Phases.** The Parties do not believe it is necessary to conduct discovery in
17 phases.

18 13. **Document Production.** All documents produced in this action will be delivered as
19 either hard copy documents or Tagged Image File Format (“TIFF”), Portable Document Format
20 (“PDF”), and compressed digital files (JPEG) images unless the requesting party specifically
21 requests that any responsive electronic documents be produce in native format. If a requesting party
22 seeks metadata regarding an electronically stored document, that party shall specify the request for
23 metadata in the request or by separate request for production.

24 ///

14. **Protective Orders for Confidential Documents and/or Information.** The Parties discussed confidential information and the process for addressing inadvertent disclosure of privileged information. They have agreed to separately prepare a stipulated protective order for the Court's consideration, if needed.

DATED: March 13th, 2025

JENNINGS & FULTON, LTD.


/s/ Logan G. Willson, Esq.
 ADAM R. FULTON, ESQ.
 Nevada Bar No. 11572
 E-mail: afulton@jfnvlaw.com
 LOGAN G. WILLSON, ESQ.
 Nevada Bar No. 14967
 E-mail: logan@jfnvlaw.com
 2580 Sorrel Street
 Las Vegas, Nevada 89146
Attorneys for Plaintiff

DATED: March 13th, 2025

SALTZMAN MUGAN DUSHOFF

/s/ Matthew T. Dushoff, Esq.
 MATTHEW T. DUSHOFF, ESQ.
 Nevada Bar No. 4975
 mdushoff@nvbusinesslaw.com
 JOEL Z. SCHWARZ, ESQ.
 Nevada Bar No. 9181
 jschwarz@nvbusinesslaw.com
 ELIZABETH FRIEDMAN, ESQ.
 Nevada Bar No. 14472
 efriedman@nvbusinesslaw.com
 1835 Village Center Circle
 Las Vegas, Nevada 89134
*Attorneys for Defendant University
 Medical Center of Southern Nevada*

IT IS SO ORDERED.



 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

DATED: March 14, 2025

JENNINGS & FULTON, LTD.
 2580 Sorrel Street
 Las Vegas, NV 89146
 702.979.3565

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of JENNINGS & FULTON, LTD., and that on the 13th day of March 2025, I caused a true and correct copy of the foregoing **Renewed Joint Discovery Plan and Scheduling Order** by U.S. Mail addressed to the following counsel of record at the address listed below:

SALTZMAN MUGAN DUSHOFF
MATTHEW T. DUSHOFF
Nevada Bar No. 004975
mdushoff@nvbusinesslaw.com
JOEL Z. SCHWARZ
Nevada Bar No. 009181
jschwarz@nvbusinesslaw.com
ELIZABETH FRIEDMAN
Nevada Bar No. 014472
efriedman@nvbusinesslaw.com
1835 Village Center Circle
Las Vegas, Nevada 89134
Telephone: (702) 405-8500
Facsimile: (702) 405-8501
Attorneys for Defendant
University Medical Center of Southern Nevada

/s/ Erika Perez
An Employee of
JENNINGS & FULTON, LTD.

JENNINGS & FULTON, LTD.

2580 Sorrel Street
Las Vegas, NV 89146
702.979.3565